

October 14, 1997

Mr. Jorge DeGuzman
Air Pollution Control Engineer
Sacramento Metropolitan Air Quality Management District
8411 Jackson Road
Sacramento, CA 95826

Re: Proposed Title V Operating Permit for Grafil, Inc.

Dear Mr. DeGuzman:

The U.S. Environmental Protection Agency (EPA) appreciates the opportunity to review and comment on the proposed Title V Operating Permit for Grafil Inc. (No. 96-01). In accordance with 40 CFR §70.8(c), and the Sacramento Metropolitan Air Quality Management District (District) Rule 207, the EPA has reviewed the proposed permit during our 45-day review period.

In general, the proposed permit establishes enforceable conditions with adequate monitoring, record keeping and reporting requirements. However, as my staff discussed with you on October 9, 1997 there are several issues/corrections that require changes to the proposed permit. We have enclosed our comments for your review.

We look forward to working with you to resolve any outstanding issues. If you have any questions concerning our comments, please do not hesitate to contact John Walser of my staff at (415) 744-1257.

Sincerely,

Matt Haber
Chief, Permits Office
Air Division

enclosure

cc: Ray Menebroker, CARB
H. Suago, Grafil, Inc.

ENCLOSURE

EPA Comments on the Proposed Title V Operating Permit for Grafil Inc.

1. *APC Afterburner #1* -- In Permit No. 11425, Condition 4 requires the afterburner to operated at a minimum temperature of 750 degrees C, averaged over a one hour period. Condition 5 states that the temperature gauge and associated chart recorder for the afterburner shall be maintained to monitor and record the temperature when the process is in operation. As agreed to in our discussion on October 9, these conditions must be added to the Title V permit in the equipment specific requirements section for process lines 31 and 32 or separately under equipment -specific requirements for the afterburners as appropriate.
2. *APC Afterburner #2* -- In Permit No. 11427, Condition 4 requires the afterburner to operated at a minimum temperature of 700 degrees C, averaged over a one hour period. Condition 5 states that the temperature gauge and associated chart recorder for the afterburner shall be maintained to monitor and record the temperature when the process is in operation. As agreed to in our discussion on October 9, these conditions must be added to the Title V permit in the equipment-specific requirements section for process lines 31 and 32, or separately under an equipment-specific requirements section for the afterburners as appropriate.
3. *Boiler* -- In the Equipment-Specific Requirements Section of the permit for the boiler, Condition 1 states that the boiler shall operate on natural gas only. In order to demonstrate compliance with the emission limits listed in the permit, the unit should be limited to combusting PUC-regulated natural gas, or, if non-PUC regulated natural gas is combusted, periodic testing of the gas may be necessary to demonstrate compliance. The permit evaluation states that the natural gas being used has a sulfur content of 0.22 grains/100 cu. ft. PUC-regulated natural gas is tested and certified to meet a standard less than 5 grains/100 cu. ft. Please clarify which fuel is being used.
4. *Standby IC Engine* -- In the Equipment-Specific Requirements Section of the permit for the standby IC engine, Section A, Equipment Description, states that the fuel used is propane. Please add a condition to the permit which clarifies that the engine will operate on propane only, if that is the case. Condition 3 states that operation for other than maintenance purposes shall be limited to actual interruptions of power by the serving utility. Actual interruptions of power are defined to include when the power reserves of the serving utility fall below 5 percent. It might be helpful to describe how frequently that situation occurs, e.g., once per month, several times each summer etc.
5. *MACT Standard* -- It is our understanding that the facility is not a major source of HAPs, as demonstrated by the July 1995 source test data listed in the permit evaluation, and therefore not subject to the requirements for Maximum Control Technology (MACT) standards (40 CFR 63, subpart CC). We recommend adding a discussion to the General Requirements section of the permit discussing this.
6. *Architectural Coatings* -- Conditions 30, 31, and 32 cover VOC emissions from architectural coatings (District Rule 442). However, no reporting or record keeping is required

by the rule, and there is no provision for it in the permit. EPA recognizes that the rule is primarily a manufacturing and sale restriction, but the source shares responsibility in ensuring that it purchases and uses products that comply with the rule. Therefore, the permit should contain a provision for recording architectural coatings purchased and applied. Although California has a state law which assures compliance with the rule, coatings may be purchased from other states. Thus we suggest the following language:

Grafil, Inc. shall keep a record of all architectural coatings purchased that are not clearly labelled as complying with the VOC content limits contained in Rule 442. Compliance in these cases can be determined by maintaining records of manufacturer's certifications or by Material Safety Data Sheets (MSDS) that demonstrate compliance with the VOC limits of Rule 442.

7. *Clarification* -- on Page 8, Conditions 19 and 22 have similar language but reference different sections of Rule 207. Condition 19 references Rule 207, Section 501.1, and Condition 22 references Rule 207, Section 304. The language in Rule 207, Section 304 concerns certification requirements. Please revise Condition 22 with the appropriate language from Section 304. We suggest the following:

Any title V application form, report, or compliance certification submitted pursuant to these regulations shall contain certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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